

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

Maria Isabel De Loera

PRINCIPAL

YOB:

1993

United States

CRIMINAL COMPLAINT

Case Number:

M-19-0246 -M

United States District Court
Southern District of Texas
FILED

FEB 03 2019

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 1, 2019 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Jairo Yozeth Galvez-Romero, a citizen and national of Honduras, who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said alien in furtherance of such violation of law within the United States, that is, from a location near Los Ebanos, Texas to the point of arrest near Los Ebanos, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On February 1, 2019, Border Patrol Agents working near Los Ebanos, Texas were advised of a camera activation that showed two (2) subjects running north away from the Rio Grande River. Agents observed a white GMC Sierra parked near an intersection just north of the location where the subjects were seen running on the camera activation. Shortly after, four subjects were seen emerging from the wooded area and boarding the GMC Sierra.

I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on February 03, 2019.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

/s/ Gerardo Montalvo

Signature of Complainant

Submitted by reliable electronic means, sworn to and attested telephonically per Fed. R. Cr.P.4.1, and probable cause found on:

@4:39pm

Gerardo Montalvo Senior Patrol Agent

Printed Name of Complainant

February 3, 2019

Date

at McAllen, Texas

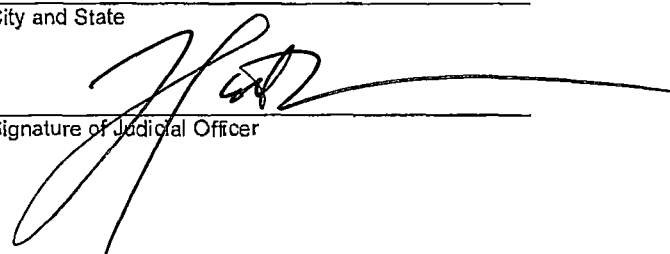
City and State

J. Scott Hacker

U. S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-19- 0246 -M

RE: Maria Isabel De Loera

A201 724 236

CONTINUATION:

While Agents maintained visual of the GMC Sierra, an Agent followed the vehicle and queried the vehicles registration to which the address returned from another city, a common trend seen from smugglers. The Agent activated his emergency equipment in attempt to conduct a vehicle stop. As the vehicle was coming to a stop, but still in motion, the front and rear passenger doors opened and the Agent observed four (4) subjects exit the vehicle in attempt to abscond. The Agent relayed this information to responding Agents and proceeded to approach the driver of the vehicle. The driver remained in the driver seat and was later identified as Maria Isabel De Loera, a United States Citizen. Shortly after, the four (4) subjects that ran out of the vehicle were apprehended within close proximity of the vehicle stop. All four (4) subjects admitted to being illegally present in the United States. All subjects were then taken into custody and transported to the Border Patrol Station for processing.

PRINCIPAL STATEMENT:

Maria Isabel De Loera was read her Miranda Rights and was willing to provide a sworn statement without an attorney present.

De Loera stated that she was in need of money because she hadn't been able to find a job. She stated that a male friend, who she refused to identify, got her in communication with an unknown person, who offered her \$200 USD per person she transported to McAllen, Texas. De Loera stated she was given the location of where to pick up the people via cell phone. She further stated the subjects had dirty clothes and she had an idea that the people were illegal aliens.

MATERIAL WITNESS:

Jairo Yozeth Galvez-Romero, a citizen and national of Honduras, will be held as a material witness for this smuggling case.